

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**In Re: KERRY MOODY
Debtor(s)**

**Case No. 16-31964-hcm
Chapter 13**

**MOTION FOR EXTENSION OF TIME IN WHICH TO FILE
REQUIRED STATEMENTS, SCHEDULES, CHAPTER 13
PLAN AND LISTS PURSUANT TO BANKRUPTCY PROCEDURE RULE 1007**

Now comes **KERRY MOODY**, by and through the undersigned attorney, **Michael R. Nevarez**, and respectfully represents unto this Honorable Court:

1. That prior to the filing of this Motion, the Debtor filed a “bare bones” Voluntary Petition on December 5, 2016, under the provisions of 11 U.S.C. Chapter 13.
2. That this Court has jurisdiction over this proceeding pursuant to 28 U.S.C. section 1334, and 11 U.S.C. Section 362(a) and 28 U.S.C. Section 157.
3. Debtor was required, pursuant to Bankruptcy Procedure Rule 1007, to file the Chapter 13 Plan, the remaining statements, and schedules and lists by December 19, 2016.
4. That the Debtor respectfully requests an additional fourteen (21) days, until January 9, 2017, to file the additional documents required under Bankruptcy Rule 1007, and in support thereof informs this Honorable Court of the following:
 - a) That the Debtor has been unable to provide all the supporting Pay Advices, Tax Returns and Bankruptcy Questionnaire for review by the undersigned.
 - b) That within the requested fourteen day extension period, the undersigned avers that will be adequate time to review all documents to be provided for calculations of Schedule I & J, the CMI, as well as the Plan, and for presentation to the Court.

WHEREFORE, the Debtor moves this Honorable Court to grant the requested additional time to file the Schedules, Statements, Plan and necessary supporting documentation by entering a second extension Order for January 9, 2017. Debtor further moves this Honorable Court for such other relief as the nature of this cause may require.

Respectfully submitted,

/s/ Michael R. Nevarez
Michael R. Nevarez
Attorney at Law
Post Office Box 12247
El Paso, Texas 79913
915-584-8000
MNevarez@LawOfficesMRN.com

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify on December 21st, 2016, a copy of the foregoing was served electronically via ECF to the Chapter 13 Trustee, Stuart C. Cox, and also served upon the following via U.S. Postal Service, postage pre-paid.

Kerry Moody
323 Rio Verde Drive
El Paso, TX 79912

Signed, this 21st day of December, 2016

/s/ Michael R. Nevarez
Michael R. Nevarez
Attorney for Debtor